

WILLKIE FARR & GALLAGHER_{LLP}

300 North LaSalle
Chicago, IL 60654-3406
Tel: 312 728 9000
Fax: 312 728 9199

Hon. Judge Paul G. Gardephe
United States District Court
Southern District of New York
40 Foley Square
New York, NY 10007

RE: **Case 1-16-cv-09129-PGG** *Noble Security, Inc. et al. v. ACCO Brands Corp.*

Dear Judge Gardephe:

Plaintiffs and Counterclaim-Defendants Noble and Defendant and Counterclaim-Plaintiff ACCO write to jointly request that the deadlines for the schedule for briefing the parties' motions for summary judgment be extended.

Specifically, the parties request the following extensions:

1. Moving Papers would be due on **March 29, 2024** (current due February 16, 2024).
2. Opposition Papers would be due on **April 26, 2024** (currently due March 15, 2024).
3. Reply Papers would be due on **May 17, 2024** (currently due March 29, 2024).

This request is being made to accommodate pre-existing conflicts in the schedules of counsel for Defendant and Counterplaintiff, ACCO Brands Corp. This extension will also allow the parties additional time to consider the motions they each brief for the court.

The parties have previously jointly requested (1) the court extend the deadline for completion of fact discovery on July 29, 2022, which the Court granted, (2) the court extend the deadline for completion of fact discovery on September 28, 2022, which the Court granted and (3) the court extend the deadline for completion of expert discovery on March 28, 2023, which the Court granted.

No other deadlines are affected by this stipulation, as there is no current court deadline for dispositive motions or trial.

January 29, 2024

Page 2

Dated: January 29, 2024

On behalf of
PLAINTIFFS AND COUNTER-CLAIM
DEFENDANTS NOBLE SECURITY, INC.
AND MEIR AVGANIM

Respectfully submitted,

On behalf of
DEFENDANT AND COUNTER-CLAIM
PLAINTIFF ACCO BRANDS CORP.

/s/ Max Moskowitz

By Consent
Max Moskowitz
OSTROLENK FABER LLP
mmoskowitz@ostrolenk.com
845 Third Avenue
New York, NY 10022
(212) 596-0504

/s/ Michael G. Babbitt

Michael G. Babbitt
WILLKIE FARR & GALLAGHER LLP
mbabbitt@willkie.com
300 North LaSalle Street
Chicago, IL 60654
(312) 728-9000